LMF: USAO 2011R00415

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

SEP 7 2011

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

CRIMINAL NO.

PJM 11 CR 048 9

DANTE LAW, a/k/a "Prepaid," and IDA BROWN,

v.

(Conspiracy to Transport a Minor With the Intent to Engage in Criminal Sexual

* Activity, 18 U.S.C. § 2423(e);* Forfeiture, 18 U.S.C. § 2428))

Defendants

*

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Between on or about April 19, 2011 and on or about May 10, 2011, in the District of Maryland and elsewhere, the defendants,

DANTE LAW, a/k/a "Prepaid," and IDA BROWN,

did knowingly conspire with others known and unknown to the Grand Jury to violate Title 18, United States Code, Section 2423(a), namely, to knowingly transport an individual who had not attained the age of 18 years in interstate and foreign commerce, with the intent that the individual engage in prostitution.

18 U.S.C. 2423(e)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

- 1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 2428, in the event of the defendant's conviction under Counts One of this Indictment.
 - 2. As a result of the offense charged in Count One of the Indictment, the defendants,

DANTE LAW, a/k/a "Prepaid," and IDA BROWN,

shall forfeit to the United States:

- a. any property, real or personal, used or intended to be used to commit or to facilitate the commission of such offense, including, but not limited to the vehicle owned by **IDA BROWN**, a 1999 Acura, Maryland License Plate 8AD8227, Vehicle Identification Number 19UUA564XXA013219; and
- b. any property, real or personal, constituting or derived from any proceeds traceable to Count One of the Indictment.
- 3. If any of the property described above as being subject to forfeiture pursuant to 18 U.S.C. § 2428(a) and (b), as a result of any act or omission of the defendants,
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or

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e. has been commingled with other property that cannot be subdivided without difficulty;

the United States intends to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

18 U.S.C. § 2428

Rod J. Rosenstein

United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Porcheron

7 September 20/1